State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

RICHARD C. SALKIE, P.E.
ASSOCIATE DIRECTOR

31 DEC 1985

Mr. I. Leo Motiuk
Schaff, Mahon, Motiuk, Gladstone & Conley
One Main Street
Flemington, New Jersey 08822

RE: Diamond East Laboratories Corporation
(Diamond Aerosol Corporation)
Glen Gardner
NJD 049 644 438

Dear Mr. Motiuk:

As closing of Diamond East Laboratories Corporation (the facility) approaches, final closure procedures under the New Jersey Hazardous Waste Management Regulations must be followed in accordance with N.J.A.C. 7:26-9.8.

In addition to the regulatory requirements under ECRA, NJPDES, and hazardous waste enforcement, the facility shall close the hazardous waste drum storage area listed on the USEPA Part A permit application dated June 24, 1982 with the Bureau of Hazardous Waste Engineering.

As illustrated on the attached facility site plan, "Area 5" is the only area of concern to the Bureau. Any other area located at this facility does not concern this Bureau but may concern ECRA, NJPDES, or hazardous waste enforcement.

In accordance with N.J.A.C. 7:26-9.8, the facility shall submit to the Bureau the following information:

(1) A schedule for final closure setting a date when the last shipment of hazardous waste drums will be manifested off-site to an authorized commercial hazardous waste facility.

(2) A soil sampling and analysis plan for the drum storage area and associated drainage areas following the attached guidance documents entitled, "Sampling and Analysis Guidelines for Submission of RCRA Sampling and Analytical Plans" and "Guidelines for the Development of Field Sampling and Analytical Plans".

(4) A remedial decontamination plan which identifies procedures for contaminant removal, collection, and equipment to be used.

Please submit the aforementioned information to the Bureau within thirty (30) days from the date of this letter. Failure to submit this information within this time frame may result in enforcement action taken against the facility.

If there are any questions, please contact my office at (609) 984-4892.

Very truly yours,

Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

EP6:lk
cc: John Dickinson, ORS
Ann Witt, ECRA
Angel Chang, USEPA
Steve Spayd, DWR - Geologic Survey
George Smajda, DWM - Centrol Field Office

Inspection Report

Diamond Aerosol Corp.
62 Anthony Road
Glen Gardner, NJ 08826

Inspector: Edward J. Guster III, Environmental Scientist, USEPA Region 2

Date of Inspection: December 30, 2003

EPA ID #: NJD049644438
Reason for Inspection: CEI

Attendees:
George B. Diamond – Owner

Background:

Mr. Diamond stated that the company has not generated hazardous waste since 1984. The company packed up and moved to Pennsylvania in 1984. Prior to 1984, the facility mixed chemicals and created sample products for different companies (Glade, Windex, J&J, etc.). Now, there is a small lab that gets used once every two weeks, if that according to Mr. Diamond, to make small sample tester products to send to manufacturers and conusmers.

However, manifest records show that waste, in Small Quantity Generator amounts have been shipped from the site in 2003. Mr. Diamond explained that it was from a cleanup of old materials and site soil cleanup.

Mr. Diamond and an assistant are the only people that work at the site.

Inspection Summary

Mr. Guster entered the facility and met Mr. Diamond. Mr. Diamond explained that the facility no longer operated like it once did in the 70's and early 80's. Mr. Diamond stated that he still had a small lab that he worked in once every two weeks, if that. He just took samples given to him and placed them in a container and sent them out for testing.

Mr. Guster looked at manifests records and other letters from the NJDEP regarding the facility and generation of waste.

Mr. Guster and Mr. Diamond went to the lab. The lab was locked and Mr. Diamond had to get the key to open it. The lab was a small room that contained a scale, refrigerator, some empty aerosol cans, various household products (Glade, Windex, etc.), a bottle of what was labeled alcohol, a telephone and boxes. Mr. Diamond stated that he has not been in the lab for a while.

~~CUSTOM ALLOY CORPORATION~~ George B. Diamond

DATE: 12/29/03 HAZARDOUS WASTE MANIFEST SYSTEM SCREEN: HWS1760

TIME: 13:27:46 GENERATORS / MANIFESTS TERMINAL: @3EP

EPA ID: NJD049644438 COMPANY NAME AND ADDRESS

DIAMOND AEROSOL CORP
62 ANTHONY ROAD
GLEN GARDNER NJ 08826

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1	UNIT 1	QTY 1	MORE
0001	05-15-2003	MDC1026176	MDD980555189	D001	P	400	X
0002	05-15-2003	NJA5119994	NCD000648451	D009	P	5	X ✓
0003	05-15-2003	NJA5119995	NCD000648451	D002	P	750	X ✓
0004	06-03-2003	NJA5119916	NCD000648451	D001	P	125	X ✓
	08-22-03	NJA 4112773	PCBs	15 yards			

went to PA in 1983/84
1983 was when plant was moved out
no longer make chemicals

used to fill containers
made products ? +

There is still a small lab that does very little at the lab once every 2 weeks

202N to Summer Rd
make U-turn onto 202S
Right on River Rd
left on CR 612/Bartles Corner Rd
R on 31N 11.4 miles
R on Rocky Run Rd 2.2
Slight left to Beth LN 0.7
R on CR-628/W Hill Rd 0.3
L onto Wood Glen Rd 1.9
end at 62 Anthony Rd.

Paul Gallo

EPA United States Environmental Protection Agency

CM&E Evaluations List

RCRA Info

DIAMOND AEROSOL CORP **GLEN GARDNER** **NJD049644438**

Select the Evaluation to process or choose the Add New Evaluation button below:

Your search has found **13** Evaluations.

Evaluations							Violations						
Act Loc	Seq #	Type	Date	Agency	Resp Person	Reason	Determined Date	Seq #	Type	Resp Agency	Class - Priority	Latest Sched RTC	Actual RTC
NJ	000	CDI	11/30/1994	S	NJJT		No violations linked to this evaluation at this time.						
NJ	000	CEI	11/4/1993	S	NJRJ		No violations linked to this evaluation at this time.						
NJ	000	OTH	2/26/1992	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	000	CEI	11/7/1991	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	009	CEI	9/4/1990	S	R2DEP		9/4/1990	0007	DOT	S	1 -	9/18/1990	10/2/1990
NJ	008	CEI	10/13/1988	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	007	NRR	3/18/1988	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	006	NRR	6/19/1987	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	005	CEI	11/6/1986	S	R2DEP		11/6/1986	0003	DOT	S	1 -	7/8/1987	7/27/1987
NJ	004	NRR	5/15/1986	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	003	NRR	12/24/1985	S	R2DEP		No violations linked to this evaluation at this time.						
NJ	002	NRR	8/17/1984	S	R2DEP		8/17/1984	0001	DFR	S	2 -	10/24/1984	10/22/1984
NJ	001	NRR	1/26/1984	S	R2DEP		No violations linked to this evaluation at this time.						

Add New Evaluation

Go To

URL: CME/CME_eval_main.asp

EPA United States Environmental Protection Agency

CM&E Violations List

RCRA Info

DIAMOND AEROSOL CORP **GLEN GARDNER** **NJD049644438**

Select the Violation to Process:

Your search has found **5** Violations.

Violations									Evaluations			Enforcements			
Act Loc	Seq #	Type	Deter Date	Resp Agency	Class - Priority	Qual	Actual RTC	Citation	Date	Type	Agency	Date	Type	Agency	Scheduled RTC
NJ	0007	DOT	9/4/1990	S	1 -	O	10/2/1990		9/4/1990	CEI	S	9/4/1990	120	S	
NJ	0003	DOT	11/6/1986	S	1 -	O	7/27/1987		11/6/1986	CEI	S	6/16/1987	310	S	
NJ	0004	DOT	11/6/1986	S	2 -	O	12/8/1986		11/6/1986	CEI	S	6/16/1987	310	S	
NJ	0010	DCL	11/6/1986	S	1 -	O	12/8/1986		11/6/1986	CEI	S	11/6/1986	120	S	
NJ	0001	DFR	8/17/1984	S	2 -	O	10/22/1984		8/17/1984	NRR	S	9/21/1984	120	S	

To ADD a violation, you must go through the CM&E Main Menu Evaluation track and Add/Update the evaluation which first saw the violation.

Go To

URL: CME_viola_main.asp

H

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

DRAFT

FACILITY INFORMATION Diamond East Labs

FACILITY NAME: AKA Diamond Aerosol

FILE NUMBER: 10-12-06

VHT FACILITY FILE NUMBER:

PERMIT #:

REGION: N

INSPECTION DATE: 11/7/91

INCIDENT/CASE NUMBER:

INSPECTION TYPE: TSD

RESPONSIBLE AGENCY CODE: NJDEPE

INSPECTOR'S NAME: Darnell Holt

INSPECTOR'S AGENCY: Enforcement Policy

INSPECTOR'S BUREAU: NBW & HWFO

EPA ID NUMBER: NJD049644438

ADDRESS: Anthony & Wood Glen Rds.
Glen Gardner, NJ 08826

LOT: BLOCK:

COUNTY: Hunterdon

FACILITY PERSONNEL: Ralph Helmrick

TELEPHONE #: (908) 832-5333

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY: Darnell Holt

Reviewed by: [signature] 12-6-91

PHOTOS TAKEN: (__) YES (✓) NO

SAMPLE TAKEN: (__) YES (✓) NO

If yes, how many?

NO. OF SAMPLES: ____ NJDEP ID #: _____

MANIFESTS REVIEWED: (✓) YES (__) NO

Number of Manifests in Compliance: 2

Number of Manifests Not in Compliance: 0

List Manifest Document Numbers of Those Manifests Not in Compliance:

Describe the activities that result in the generation of hazardous waste.

Could generate hazardous waste from obsolete chemicals and contaminated soils. Generated DOOL waste in the past.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes).

Obsolete chemicals yet to be identified. (Mostly non-hazardous, for example, "Vaseline")

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards? NA

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ___ NA ✓

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ✓ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001	FRontier chemical NIAGRA FALLS NY
___	_____
___	_____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.) NA

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ___ No ___ NA

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
____	_____
____	_____
____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ___ No ___ NA

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ✓ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

Company is a TSD going through closure activities, waste shipped off site before the effective DATE of LAND BAN. Company is acting as generator only. ~~TSD Checklist has not been filled out.~~ DH

Diamond Aerosol

TSD

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ___
California List Wastes	Yes ___	No ___	NA ___
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? ___/___/___

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ___ No ___ NA

If yes, which of the following are sources of analytical data? (More than one may apply.):

___ Generator provides data
___ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ___ No ___ NA ___

If analyses are conducted off site, identify lab:_____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ✓ NA ___

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

NA

Yes ___ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ___ No ___ NA

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ___ No ___ NA ✓

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ___

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. **Storage [40 CFR 268.50]**

1. Are prohibited* wastes stored on site in containers? No Hazardous waste is on site

Yes ___ No ✓ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ✓ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____
_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

   Yes ___ No ✓ (If No, go to H.)

2. On-Site Management

   a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

      Yes ___ No ___ NA ___

   b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

      Yes ___ No ___ NA ___

      *This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

   Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

   Yes ___ No ___ (If No, go to 4.)

   Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

   Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

   Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ___ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
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Inspection and General Description and Operation :

Diamond Aerosol aka Diamond East Lab Inc. (Diamond) is no longer manufacturing. The corporation still exists but only has two employees, Mr. George Diamond and Ralph Helmrich. The only activity conducted by Diamond is to complete clean up of the facility and to close out hazardous waste facility activities. Diamond must still obtain certification to fulfill regulatory requirements. The company will remain a TSD until final certification is complete.

In 1990 Diamond shipped off 2 loads of waste. They have not shipped anything off-site for 1991. The company plans to ship more waste off-site in the future, but expects most of it to be non-hazardous.

There are presently two companies utilizing the site, Selvac and Washington Labs (WL). WL is a manufacturing type business, and Selvac is a testing\research type firm. WL uses the same type of processes that Diamond used. It is basically a filling operation. A tear gas powder is dissolved in 1,1,1 trichloroethane or trichloroethylene and the mixture is pressurized using carbon dioxide gas into small 4 ounce containers. If the containers are misfilled then the container is emptied and the "concentrate" reused. WL states that no hazardous waste is generated from its manufacturing process. Selvac also states that no hazardous waste is generated from its operation. Hazardous waste was not found to be a part of the WL process.

As far as Diamond is concerned, areas that have to be cleaned up are the obsolete hazardous waste storage pad, and a warehouse area where waste materials must be removed. Mr. Helmrick estimates that a "couple of thousand" gallons of material have to be removed from the site. The company does not remove concentrate from old Diamond Aerosol products, that part of the cleanup has been done already.

No violations were cited against the company.

HAZARDOUS WASTE FACILITY STANDARDS

		YES	NO	N/A
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	✓	—	—
7:26-7.4(a)4i	The generator's name, address and phone number.	✓	—	—
7:26-7.4(a)4ii	The generator's EPA ID number.	✓	—	—
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓	—	—
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓	—	—
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓	—	—
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓	—	—
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓	—	—

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓	—	—
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	—	—	✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓	—	—
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓	—	—
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓	—	—
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓	—	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓	—	—
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	—	—	✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of			

		YES	NO	N/A
7:26-9.4(b)	Waste Analysis NoT Necessary			
7:26-9.4(b)1i	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis most contain all the information necessary for proper treatment storage or disposal of the waste).			
7:26-9.4(b)1iii	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:			
	Waste characteristics vary:		✓	
	All waste(s) are basically the same:	✓		
	Company treats all waste(s) as hazardous:			
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?			
	Does it contain:			
7:26-9.4(2)i	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?			
7:26-9.4(b)2ii	The test methods which will be used to test for these parameters?			
7:26-9.4(b)2iii	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?			
7:26-9.4(b)2iv	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?			
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?			
7:26-9.4(b)2vii	Procedures which will be used to identify changes in waste stream characteristics?			
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).			✓

		YES	NO	N/A
7:26-9.4(b)4	If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?			✓
	Does the plan describe:			
7:26-9.4(b)41	The procedures which will be used to determine the identity of each shipment of waste managed at the facility?			
7:26-9.4(b)4ii	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?			
7:26-9.4(c)1	Did the facility accept hazardous waste which it is not authorized to handle?			
7:26-9.4(i)	Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b) and 9.4(c) as applicable written in the operating log?			
7:7:26-9.4(h)	**Security**			
	Does the facility have:			
7:26-9.4(h)1i	A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?			✓
7:26-9.4(h)1ii	An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?			
7:26-9.4(h)3	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?			
	If no, explain what measures are taken for security.			

Facility not active anymore

		YES	NO	N/A
7:26-9.4(f)	General Inspection Requirements			
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
7:26-9.4(f)1i	Discharge of hazardous waste constituents to the environment?			
7:26-9.4(f)1ii	A threat to human health?			
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?			
7:26-9.4(f)3i	Did the owner or operator submit the written inspection schedule to the department?			
	If yes, when was it submitted?			
7:26-9.4(f)3iii	Is the written inspection schedule kept at the facility?			
7:26-9.4(f)3iv	Does the schedule identify the types of problems to be looked for during the inspection?			
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?			
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have not been remedied?			
7:26-9.4(f)6	Does the owner/operator record inspections in a log?			

		YES	NO	N/A
7:26-9.4(f)6	Are these records kept for at least three (3) years from the date of inspection?			
7:26-9.4(f)6	Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?			
7:26-9.4(g)	**Personnel Training**			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six months of having been employed? (only 2 employees have consultant doing work (clean-up) Vectre Corp.)			
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?			
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of training?			
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?			
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?			
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?			
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?			

		YES	NO	N/A
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?			
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?			
7:26-9.6	**Preparedness and Prevention** Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-9.6(b)1	An internal communications or alarm system?			
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?			
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?			
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?			
7:26-9.6(c)	Is equipment tested and maintained?			
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?			
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?			
	If no, please explain.			

		YES	NO	N/A
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?			
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?			
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?			
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?			
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?			
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?			
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two inspections annually?			
7:26-9.7	**Contingency Plan and Emergency Procedures**			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?			X

		YES	NO	N/A
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?			
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?			
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with NJAC 7:1E-4.1 et seq.?			
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services?			
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates?			

		YES	NO	N/A
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?			
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?			
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan: 1. Maintained at the facility; and 2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?			
7:26-9.7(k)	Is there at least one employee on site or on call with the responsibility of coordinating all emergency response measures?			
7:26-9.8	**Closure Plan**			
7:26-9.8(c)	Does the facility have a written closure plan? Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility? If yes, does the plan include:			

		YES	NO	N/A
7:26-9.8(e)11	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?	✓	—	—
7:26-9.8(e)111	The maximum extent of the operation which will be open during the life of the facility?	✓	—	—
7:26-9.8(e)2	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?	✓	—	—
7:26-9.8(e)3	A description of the steps needed to decontamination facility equipment during closure?	✓	—	—
7:26-9.8(e)4	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?	—	—	✓
	Post Closure Plan			
7:26-9.9(g)	Does the facility have a written post-closure plan kept at the facility?	—	—	✓
	If yes, does the plan:			
7:26-9.9(i)	Identify the activities which will be carried on after closure and the frequency of these activities?	—	—	✓
7:26-9.9(i)1	Include a description of the planned ground water monitoring activities and frequencies at which they will be performed?	—	—	✓
7:26-9.9(i)2	Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:	—	—	✓
7:26-9.9(i)21	The integrity of the cap and final cover or other containment structures where applicable?	—	—	✓
7:26-9.9(i)211	Describe the function of the facility monitoring equipment?	—	—	✓

		YES	NO	N/A
7:26-9.9(i)3	Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?			
	Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
	If yes, what is it?			

Please circle all appropriate activities and answer questions in appropriate sections all activities circled. NA

Storage	Treatment	Disposal
Container	Tank	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundments	Thermal Treatment	Other _____
Waste Piles		
Other _____	Chemical, Physical and Biological Treatment	
Other _____		

7:26-9.4(d) **Containers** None

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).

7:26-9.4(d)11	Do the containers appear to be a sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?			X
	If no, explain.			

		YES	NO	N/A
7:26-9.4(d)1ii	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?			
	If no, explain.			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?			
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?			
7:26-9.4(d)4i	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?			
	If no, explain.			
7:26-9.4(d)4iii	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			
	If no, explain.			
7:26-9.4(d)iv	Are containerized hazardous wastes segregated in storage by waste type?			
7:26-9.4(d)v	Are containerized hazardous wastes arranged so that their identification label is visible?			
7:26-9.4(d)5	Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?			
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?			

		YES	NO	N/A
7:26-9.4(d)7i	Are incompatible wastes, or incompatible wastes and materials placed in the same container?			
	If yes, explain.			
7:26-9.4(d)7ii	Are hazardous wastes placed in unwashed containers that previously held incompatible wastes?			
	If yes, explain.			
7:26-9.4(d)7iii	Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device?			
7:26-9.4(e)1i	Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?			
	If no, explain.			
7:26-9.4(e)1ii	Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?			
	If no, explain.			
7:26-9.4(e)1iii	Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?			
	If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.			

		YES	NO	N/A
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?			✓
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			✓
7:26-9.4(e)2v	Threaten human health or the environment?			✓
7:26-11.2	**Tanks**			
	What are the approximate number and size of tanks containing hazardous waste? None			✓
	Identify the waste treated/stored in each tank.			
	General Operating Requirements			
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?			
	If yes, please explain.			
	Are there leaking tanks?			
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?			
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?			
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?			
7:26-11.2(c)	**Inspections**			
	Is the tank(s) inspected for:			
	1. Discharge control equipment (each operating day).			

		YES	NO	N/A
	2. Monitoring equipment (each operating day).			
	3. Level of waste in tank (each operating day).			
	4. Construction of materials of the tank (weekly).			
	5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures (weekly)?			
7:26-11.2(e)	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?			
	If no, please explain.			
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?			
7:26-9.2(b)	Are there underground tanks used to store hazardous waste?			
	If yes, how many and can they be entered for inspection?			
	Has the underground tank been in use on or before November 19, 1980? Specify Date.			
	If no, when was the tank placed in use?			
7:26-9.2(b)3i	Does the facility have a ground water monitoring plan approved by the department?			
7:26-9.2(b)3ii	Is the use of the tank specified to the manufacturers recommended lifetime?			
7:26-11.3	Surface Impoundments None			
	Describe the design and operating features of the surface impoundment to prevent ground water contamination (e.g., liner leachate collection system).			
	Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.			

		YES	NO	N/A
7:26-11.3(a)	Is there at least two feet of freeboard in the impoundment?			
7:26-11.3(b)	Do all earthen dikes have a protective cover to preserve their structural integrity?			
	If yes, please specify the type of covering.			
7:26-9.4(c)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?			
7:26-9.4(i)	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?			
7:26-11.3(d)	Does the owner or operator inspect:			
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?			
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?			
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?			
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?			
7:26-11.3(f)1i	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?			

		YES	NO	N/A
7:26-11.3(f)1ii	Is the waste treated, rendered or mixed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, of gases in sufficient quantities to threaten human health?			
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?			
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			
7:26-9.4(e)2v	Threaten human health or the environment?			
7:26-11.3(f)2	Is the surface impoundment used solely for emergencies?			
7:26-11.3(g)	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?			
	If yes, is the waste managed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?			
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?			
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			
7:26-9.4(e)2v	Threaten human health or the environment?			
7:26-11.4	**Landfills** None			
	Identify the types of waste and size of the landfill.			
	General Operating Requirements			
7:26-11.4(a)1	Is run-on diverted away from all portions of the [illegible]			

		YES	NO	N/A
7:26-11.4(a)2	Is runoff from active portions of the landfill collected?			
7:26-11.4(a)3	Is waste which is subject to wind dispersal controlled?			
	Please explain how.			
7:26-11.4(a)4	Does waste disposal or the disposal operation occur within 200 feet (60.6 meters) of the property boundary?			
7:26-11.4(a)6	Are untreated, ignitable, or reactive wastes placed in the landfill?			
	If yes, explain.			
7:26-11.4(a)7	Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?			
	If yes, explain.			
7:26-11.4(a)8	Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?			
	If yes:			
7:26-11.4(a)8i	Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a functioning leachate collection and removal system with a capacity sufficient to remove all leachate produced?			
7:26-11.4(a)8ii	Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so that free liquids are no longer present?			
7:26-11.4(a)9	Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?			
	If yes:			
7:26-11.4(a)9i	Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?			

		YES	NO	N/A
7:26-11.4(a)9ii	Is the container very small, such as an ampule?			
7:26-11.4(a)10	Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?			
7:26-11.4(a)11	Does the owner or operator of a hazardous waste landfill continue to dispose of hazardous wastes subsequent to the detection of any liquid, in the secondary collection system?			
7:26-11.4(b)	Does the owner or operator of a hazardous waste landfill maintain an operating record required in NJAC 7:26-9.4(i)?			
7:26-11.4(b)1	Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?			
7:26-11.4(b)2	The contents of each cell and the appropriate location of each hazardous waste type within each cell?			
	Are containers holding liquid waste or waste containing free liquids placed in the landfill?			
	Please describe the types and contents of such containers placed in the landfill.			
	Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?			
	Are small containers of hazardous waste in overpacked drums placed in the landfill?			
	If yes, please describe precautions taken to prevent the release of the waste.			
7:26-11.5	Incinerator None			
	What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			

		YES	NO	N/A
	Is the residue from the incinerator a hazardous waste?			
	What types of air pollution control devices (if any) are installed in the incinerator unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.5(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.5(b)1i	Heating value of the waste?			
7:26-11.5(b)1ii	Halogen and sulfur content?			
7:26-11.5(b)1iii	Concentrations of lead and mercury?			
7:26-11.5(2)	If no to any of the above questions, is there justification and documentation?			
	If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?			
	<u>Monitoring and Inspection</u>			
7:26-11.5(c)1	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			
	If no, explain.			
7:26-11.5(c)1	Does the incinerator have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).			
	If no, explain.			
7:26-11.5(c)2	Is the stack plume observed visually at least hourly for opacity and color?			

		YES	NO	N/A
7:26-11.5(c)3	Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc.?			
	If yes, describe.			
7:26-11.5(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?			
	Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.			
	If yes, explain.			
7:26-11.5(c)3	Is the incinerator inspected daily?			
7:26-11.6	Thermal Treatment None			
	What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			
	List the types and quantities of hazardous waste thermally treated.			
	Is the residue from the thermal treatment unit a hazardous waste?			
	What types of air pollution control devices (if any) are installed in the thermal treatment unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.6(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.6(b)1i	Heating value of the waste?			
7:26-11.6(b)1ii	Halogen and sulfur content?			
7:26-11.6(b)1iii	Concentrations of lead and mercury?			

		YES	NO	N/A
7:26-11.6(2)	If no to any of the above questions, is there justification and documentation?			
	If operating, does it appear the thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?			
	Monitoring and Inspection			
	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			
	If no, explain.			
7:26-11.6(c)1	Does the thermal treatment have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).			
	If no, explain.			
7:26-11.6(c)2	Is the stack plume observed visually at least hourly for opacity and color?			
7:26-11.6(c)3	Are there any signs of leaks, spills and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?			
	If yes, describe.			
7:26-11.6(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?			
	Is there any reason to believe the thermal treatment unit is being operated improperly? i.e., steady state conditions are not maintained.			
	If yes, explain.			
7:26-11.6(c)3	Is the thermal treatment inspected daily?			
7:26-11.6(e)	Is there open burning of hazardous waste?			
	If yes, what is being burned? (Only burning or detonation of explosives is permitted)			

		YES	NO	N/A
	If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?			
7:26-11.7	Chemical, Physical and Biological Treatment (Other than in tanks, surface impoundments or plant treatment facilities). Describe the treatment system at this facility and the types of wastes treated. None			
7:26-11.7(a)2	Does the treatment process system show any signs or ruptures, leaks or corrosion? If yes, describe.			
7:26-11.7(a)3	Is there a means to stop the inflow of continuously fed hazardous wastes?			
	Inspections			
7:26-11.7(c)1	Is the discharge control safety equipment (e.g., waste feed cut-off systems, bypass systems, drainage systems and pressure relief systems) in good working order?			
7:26-11.7(c)1	Are they inspected at least once each operation day?			
7:26-11.7(c)2	Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?			
7:26-11.7(c)2	Is data gathered at least once each operating day?			
7:26-11.7(c)3	Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?			
7:26-11.7(c)4	Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).			

		YES	NO	N/A
7:26-11.7(e)1	Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?			
	If yes, explain how.			
7:26-11.7(f)	Are the incompatible wastes placed in the same treatment process?			
	If yes, please explain.			
7:14A-6	Ground Water Monitoring NA			
	(Applies only to: Surface impoundments, landfills, land disposal facilities).			
7:14A-6.2	Does the owner/operator have a ground water monitoring plan approved by the department and capable of determining the facility's impact on the quality of ground water?			
	If no, please explain.			
	How many monitoring wells has the facility installed?			
	What is the depth to ground water?			
	How many deep monitoring wells are on site? (Indicate depth of monitoring wells).			
	How many shallow monitoring wells are on site? (Indicate depth of monitoring wells).			
7:14A-6.3(a)	Is the ground water monitoring system capable of yielding ground water samples for analysis?			
	If no, please explain.			
7:14A-6.3(a)1	Are monitoring wells installed hydraulically upgradient?			
	If yes, specify how many and the depth of each.			

		YES	NO	N/A
7:14A-6.3(a)2	How many monitoring wells are installed hydraulically downgradient?			
	If yes, specify how many and the depth of each.			
7:14A-6.4(a)	Does the owner/operator have a ground water sampling and analysis plan?			
	If no, please explain.			
7:14A-6.4(a)	Does the plan include procedures and techniques for:			
	1. Sample Collection			
	2. Sample Preservation and Shipment			
	3. Analytical Procedures			
	4. Chain of Custody			
	List the types and quantities of hazardous waste incinerated.			
7:26-9.4(b)3	Did the owner or operator submit the waste analysis plan to the Department?			
	If yes, when was the plan submitted?			

FAX COVER SHEET

WASHINGTON LABS. INC.
R.D.#1 Box 344
Glen Gardner, NJ 08826
Phone 201-832-5333
FAX 201-832-6631 (AUTOMATIC)

TO:

ATTN: Darnell Holt

FAX NUMBER: 201-299-7575

LOCATION:

NUMBER OF PAGES 1 OF 3 (INCLUDING COVER SHEET)

DATE SENT: 11-27-91 **FROM:** Ralph Helmrich

MESSAGE:

Enclosed is MSDS on material that Chambers believes was in our solid waste stream. When I inspected the load on Saturday Nov. 16 we could find no evidence of odor. The Supervisor of the Trenton station inspected the load with me and could find no evidence of contamination either.

If you need any further information please call.

Sincerely

Ralph Helmrich

SECTION V · HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE
None established

EFFECTS OF OVEREXPOSURE
Strong irritant to eyes, facial skin and mucous membranes.
(used as a riot control agent).

EMERGENCY AND FIRST AID PROCEDURES
Remove victim from contaminated area and remove contaminated clothing. For eye contact: flush eyes with water, seek medical attention. For skin contact: wash with cold water and soap.

SECTION VI · REACTIVITY DATA

STABILITY			CONDITIONS TO AVOID
	UNSTABLE		
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION			CONDITIONS TO AVOID
	MAY OCCUR		
	WILL NOT OCCUR	X	

SECTION VII · SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Sweep up and place in poly bags inside metal drum. Personnel should be equipped with full face respirators, Tyvek® suits and rubber gloves.

Decontaminate equipment with dilute base.

WASTE DISPOSAL METHOD
Dispose in approved landfill or incinerate according to applicable state and Federal regulations.

SECTION VIII · SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)*
Full face respirator - Chem. cartridge recommended

VENTILATION	LOCAL EXHAUST	SPECIAL
	Handle powder in Lab hood	
	MECHANICAL *(General)*	OTHER

PROTECTIVE GLOVES	EYE PROTECTION
rubber gloves	Splash goggles minimum

OTHER PROTECTIVE EQUIPMENT
protective clothing and barrier cream

SECTION IX · SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
Store in cool, dry location away from sources of ignition.

OTHER PRECAUTIONS
In cases of severe exposure, prompt medical attention should be sought.

GPO 934-140

This information is based on technical data that Fisgah Labs, Inc. believes to be reliable. It is intended for use by persons having technical skill and at their own discretion and risk. Since conditions of use are

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME: PISGAH LABORATORIES, INC.	EMERGENCY TELEPHONE NO.: 704-884-2789
ADDRESS (Number, Street, City, State, and ZIP Code): P.O. Box 567, Pisgah Forest, N.C. 28768	
CHEMICAL NAME AND SYNONYMS: O-CHLOROBENZALMALONONITRILE (DAMP XTAL)	TRADE NAME AND SYNONYMS: CS, Tear Gas — Product Being Filled into container
CHEMICAL FAMILY: NITRILE	FORMULA: $ClC_6H_4CHC(ON)_2$

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
WETTING AGENT - ISOPROPANOL	20	
THRESHOLD LIMIT VALUE: OSHA PEL 0.05 ppm 8 hr TWA		
ACGIH CEILING 0.05 ppm SKIN		
ORAL LD50 RAT: 178 Mg/Kg		

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)		SPECIFIC GRAVITY (H_2O=1)	
~~VAPOR PRESSURE~~ (mm Hg.)		PERCENT, VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)		EVAPORATION RATE (_____ =1)	
SOLUBILITY IN WATER	INSOL.		
APPEARANCE AND ODOR	WHITE TO TAN CRYSTALS - HIGHLY IRRITATING		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
EXTINGUISHING MEDIA	CO_2, DRY CHEMICAL OR WATER		
SPECIAL FIRE FIGHTING PROCEDURES	Firefighting personnel should be equipped with self contained breathing apparattus.		
UNUSUAL FIRE AND EXPLOSION HAZARDS	Smoke would be ~~irritating to eyes and mucous~~ membranes.		

(Continued on reverse side)

Diamond Aerosol

Inspection Date: 11/7/91

Subcategory Checklist

I. Characteristic Wastes.

A) Does facility handle D001 waste ?
Yes ✓ No_____
If yes, which subcategory(ies) ?

Ignitable compressed gas	Yes_____	No_____
Ignitable liquids High TOC ≥ 10%	Yes ✓	No_____
Ignitable liquids Low TOC < 10%	Yes_____	No_____
Ignitable reactives	Yes_____	No_____
Oxidizers [wastewater or non-wastewater]	Yes_____	No_____
Ignitible liquids [wastewater or non-wastewater]	Yes_____	No_____

B) Does facility handle D002 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Acids, pH ≤ 2 [wastewater or non-wastewater]	Yes_____	No_____
Alkaline, pH ≥ 12.5 [wastewater or non-wastewater]	Yes_____	No_____
Radioactive high level wastes	Yes_____	No_____

C) Does facility handle D003 waste ?
Yes_____ No ✓
If yes, which subcategory(ies) ?

Explosives [wastewater or non-wastewater]	Yes_____	No_____
Reactive cyanides:		
°wastewater - cyanides ≥ 0.86 ppm	Yes_____	No_____
°non-wastewater - total cyanides ≥ 590 ppm and amenable cyanides ≥ 30 ppm	Yes_____	No_____
Reactive sulfides [wastewater or non-wastewater]	Yes_____	No_____
Reactive [wastewater or non-wastewater]	Yes_____	No_____

D) Does facility handle D004 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

E) Does facility handle D005 waste ?
Yes_____ No ✓
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

F) Does facility handle D006 waste ?
Yes_____ No__✓__
If yes, which subcategory(ies) ?

Cadmium batteries	Yes_____	No_____
Radioactive high level wastes	Yes_____	No_____

G) Does facility handle D007 waste ?
Yes_____ No__✓__
If yes, is it this subcategory ?

Radioactive high level wastes	Yes_____	No_____

H) Does facility handle D008 waste ?
Yes_____ No__✓__
If yes, which subcategory(ies) ?

Lead acid batteries	Yes_____	No_____
Radioactive lead solids	Yes_____	No_____
Radioactive high level wastes	Yes_____	No_____

I) Does facility handle D009 waste ?
Yes_____ No__✓__
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm [organics or non-organics]	Yes_____	No_____
Low mercury < 260 ppm	Yes_____	No_____
Elemental mercury with radioactive materials	Yes_____	No_____
Hydraulic oil with mercury and radioactive materials	Yes_____	No_____
Radioactive high level wastes	Yes_____	No_____

J) Does facility handle D010 waste ?
Yes_____ No__✓__
If yes, is it this subcategory ?

Radioactive high level wastes ?	Yes_____	No_____

II. Listed wastes

A) Does facility handle F001-F005 waste ?
Yes_____ No__✓__
If yes, which subcategory(ies) ?

Non-pharmaceutical	Yes_____	No_____
Pharmaceutical [methylene chloride ≥ 0.44 mg/l]	Yes_____	No_____

B) Does facility handle F025 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

Filters, filter aids, and/or desiccants [wastewater or non-wastewater]. Yes_____ No_____
Light ends Yes_____ No_____

C) Does facility handle K061 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High zinc ≥ 15% Yes_____ No_____
Low zinc < 15% Yes_____ No_____

D) Does facility handle K069 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

Calcium sulfate Yes_____ No_____
Non-calcium sulfate Yes_____ No_____

E) Does facility handle K106 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

F) Does facility handle P065 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

G) Does facility handle P092 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____

H) Does facility handle U151 waste ?
Yes_____ No_____
If yes, which subcategory(ies) ?

High mercury ≥ 260 ppm Yes_____ No_____
Low mercury < 260 ppm Yes_____ No_____
Radioactive elemental mercury Yes_____ No_____

California List Applicability

I. California List Waste Determination.

A) Using either knowledge of the waste or determination by the paint filter liquids test (PFLT), has the generator determined whether its waste is a liquid ?

Yes ✓ No_____

B) Current Applicability.

1) Do liquid hazardous wastes contain over 50 ppm PCBs ?

Yes_____ No ✓

2) Do hazardous wastes contain Halogenated Organic Compounds (HOCs) where it is identified as hazardous by a characteristic property that does not involve HOCs ?

Yes_____ No ✓

3) Do liquid hazardous wastes contain a total concentration of more than 134 mg/l of nickel and/or 130 mg/l of thallium ?

Yes_____ No ✓

See LDR Checklist pg. 8 if yes is answered to any of the above questions, the waste is currently subject to California List Prohibitions.

C) Historical Violations.

California List Prohibitions became effective on July 8, 1987 for wastes falling under any of the following descriptions:

1) Does the liquid hazardous waste, including free liquids associated with solid or sludge, contain free cyanide at concentrations $\geq$ 1000 mg/l ?

Yes_____ No ✓

2) Does liquid hazardous waste, including free liquids associated with any solid or sludge, contain the following metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to these prohibition levels ?

Yes_____ No ✓

Arsenic	500 mg/l	Yes_____	No_____
Cadmium	100 mg/l	Yes_____	No_____
Chromium VI	500 mg/l	Yes_____	No_____
Lead	500 mg/l	Yes_____	No_____
Mercury	20 mg/l	Yes_____	No_____
Nickel	134 mg/l	Yes_____	No_____
Selenium	100 mg/l	Yes_____	No_____
Thallium	130 mg/l	Yes_____	No_____

3) Does the liquid (aqueous) hazardous waste have a pH $\leq$ 2 ?
Yes_____ No✓_____

4) Do HOC wastewaters, defined as HOC-waste mixtures that are primarily water, contain $\geq$ 1000 mg/l but < 10,000 mg/l ?
Yes_____ No_____ NA

5) Do other liquid hazardous wastes contain HOCs in total concentrations $\geq$ 1000 mg/l ?
Yes_____ No✓_____

6) Do non-liquid hazardous wastes contain HOCs in total concentrations > 1000 mg/kg ?
Yes_____ No✓_____

7) Do liquid hazardous wastes contain polychlorinated biphenyls (PCBs) at concentrations $\geq$ 50 ppm but < 500 ppm ?
Yes_____ No✓_____

8) Does the liquid hazardous waste contain PCBs $\geq$ 500 ppm ?
Yes_____ No✓_____

Diamond Aerosol
Insp. Date: 11/7/91

TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

1. Has the handler tested all its solid waste streams using the TCLP?

   Yes____ No✓

   a) If no, are there any waste streams which should be tested.

   Explain No, IF waste were generated it would Be an alcohol.

   b) If the handler is a TSD, has the owner/operator revised its waste analysis plan to incorporate the new TCLP requirements?

   Yes✓ No____

2. Does the handler generate waste exceeding the regulatory level for any constituent listed in Table I-TC?

   Yes____ No✓

   If no this checklist need not be completed.

3. Was the handlers waste(s) considered a federal hazardous waste prior to the promulgation of the new TCLP requirement?

   Yes✓ No____

   If No, proceed to question number 4. If yes, answer questions 3a), 3b) and 3c) and then stop.

   a) Have both the listed and characteristic waste code been assigned, were a listed waste exhibits a characteristic for which the waste is not listed? NA

   Yes____ No____

   Comments _____

   b) Does the handler determine and list on its manifests all of it's waste(s) TCLP characteristics?

   Yes____ No✓

   Comments Wastes do not have TCLP characteristics

c) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request indicating the new hazardous constituent(s) found in their waste(s)?

Yes ✓ No_____

4. Is the waste managed as a hazardous waste?

Yes_____ No_____

If No, this is a high priority violation. Be sure to obtain a detailed description of the wastes final disposition.

Comments _____

a) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request for the previously unregulated waste or hazardous waste unit which has become subject to hazardous waste regulation as a result of the new TC Rule?

Yes_____ No_____

NOTE: The inspector should bear in mind that any waste stream, unit or handler newly regulated on account of the change in the analytical procedures associated with the Toxicity Characteristic may now be subject to all the applicable requirements of N.J.A.C. 7:26-1, 7 - 12 and 40 C.F.R. Parts 260 - 270. All applicable current checklists should be used to determine compliance status.

EFFECTIVE DATES FOR COMPLIANCE WITH TC REQUIREMENTS

Generators of ≥1,000 kg/mo. of hazardous waste	9/25/90
Generators of <1,000 kg/mo. of hazardous waste	3/29/91

ADDITIONAL COMMENTS:_____

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
WASTE MANIFESTS FROM 11/26/88 TO 11/26/91
FROM GENERATOR NJD049644438 TO SPECIFIED TSDF'S

1HWR1631
11/26/91
0

0

GENERATOR
-DIAMOND AEROSOL CORP
ANTHONY & WOODGLEN RD
GLEN GARDNER , NJ
NJD049644438
1HWR1631
11/26/91
0

TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
FRONTIER CHEMICAL WASTE 4626 ROYAL AVE NIAGRA FALLS , NY NYD043815703	NYB1890306	04/03/90	D001	CHARACTERISTIC OF IGNITABILITY	2860 G

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
WASTE MANIFESTS FROM 11/26/88 TO 11/26/91

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Diamond Aerosol

U.S. EPA ID No.: NJD 049644438

Street: Anthony & Wood Glen Rds

City: Glen Gardner State: NJ Zip: 08826

Telephone: (908) 832-5333

Inspection Date: 11/7/91 Time: 1:00 (am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	Darnell Holt	NJDEPE	(201) 299-7570
Facility Representatives:	Ralph Helmrick	V.P.	
		(908) 832-5333	

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	___	___	___	___	___
F020-F023 and F026-F028	___	___	___	___	___
California List*	___	___	___	___	___
First Third [40 CFR 268.10]	___	___	___	___	___
Second Third [40 CFR 268.11]	___	___	___	___	___
Third Third [40 CFR 268.12]	✓	___	___	___	___

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Obsolete chemicals, mostly alcohol

LDR Waste Management:

shipped offsite to disposal company

Summary:

Not much waste was shipped off-site
NO LDR violations.

Signature: Darnell Holt

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

   _____

2. F020-F023 and F026-F028 dioxin-containing wastes:

   _____

3. California List Wastes (See Appendix A):

   _____

4. First Third Wastes [40 CFR 268.10]:

   _____

5. Second Third Wastes [40 CFR 268.11]:

   _____

6. Third Third Wastes [40 CFR 268.12]**:

   D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No ___

   If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ___ No ___ NA ✓

Comments_____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments_____

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ___ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ___ No ___ NA ✓

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	____	_____
_____	____	_____
_____	____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

   Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	____	_____
_____	____	_____
_____	____	_____

   Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001			✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ___ NA ✓

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
____	_____	__/__/__
____	_____	__/__/__
____	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

Comments_____

DRAFT

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Diamond Aerosol Corporation

U.S. EPA I.D. No.: NJD 049 644 438

Street: R.D. #1 Box 344

City: Glen Gardner **State:** NJ **Zip** 08826

Telephone: (201) 832-5333

Inspection Date: 9/4/90 **Time:** 1400 (am/pm)

Weather Conditions: Sunny, hot

	Name	Agency/Title	Telephone
Inspectors:	Farouk Afrasiabi	NJDEP Env. Specialist	(201) 299-7570
Facility Representatives:	Ralph Helmrich,	Washington Labs,	(201) 832-5333

	Generate	Transport	Treat	Store	Dispose
F-Solvent					
Dioxin					
California List					
First Third [268.10]					
Second Third [268.11]					
Third Third [268.12]					

The facility has been shut down. See the attached memo.

Form ADM-012

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO File DATE 09-06-90

FROM Farouk Afrasiabi through Joe Mirabella

SUBJECT RCRA Inspection at Diamond Aerosol Corp.

On September 4, 1990, an offensive RCRA inspection was conducted at Diamond Aerosol Corp. located at the intersection of Anthony and Glenwood Roads in Glen Gadner, New Jersey.
It was learned during this inspection that presently two companies operate at this site: Washington Labs and Selvac.

Washington Labs manufactues defensive spray devices without generating any hazardous waste. Selvac is testing and sampling company for a company based in Florida. The testing and sampling conducted at this facility is also free of any hazardous waste generation.

In 1986, Diamond Aerosol Corp. was purchased by Delcor who later transported some of the Diamond's inventory to their plant in Pennsylvania. However, Delcor still has about 100 55-gallon drums of material on site. Delcor recently received a court order to remove the remaining drums from the site.

On September 4, 1990, Diamond Aerosol Corp. was issued an NOV for employing a process not specified in their Part A Permit Application. Mr. Ralph Helmrich dismantled the distillation unit upon investigator's order and stated the following:

1. The unit was last used in 1987.

2. He distilled the solvent containing 1% orthochlorobenzylidenemalononitrile because they could not find a TSD who would accept it.

Diamond Aerosol Corp. presently has 10 55-gallon drums of waste oil (X722) on site. According to Mr. Helmrich, the waste oil is mainly water. He also stated that the drums were originally stored outside where they froze in the winter (the top of several drums were bulged, however, no leak was evident). Apparently the bulging of the drums was caused by the expansion of water due to freezing.

17

RCRA INSPECTION FORM

Report Prepared for:

Generator [X]

Transporter [ ]

HWM (TSD) facility [X]

Copy of report sent to the facility [ ]

Facility Information

Name: DIAMOND AEROSOL CORP.

Address: Anthony & Wood Glen Rd.
Glen Gardner N.J. 08826

County: Hunterdon

EPA ID#: NJD049644438

Date of Inspection: JAN / 27 / 83

Participating Personnel

State or EPA Personnel: Mike Nalbone
BRUCE VENNER

Facility Personnel: George Diamond
Chairman of the board
Phone (201) 832-7128

Report Prepared by Name: Mike Nalbone

Agency: NJDEP

Telephone #: (609) 292-9592

Approved for the Director by: _____

-A-

Summary of Findings

Facility Description and Operations

The Diamond Aerosol Corp. has been operating since 1956. The company started out as a manufacturer of Lab chemicals. Approximatly 15 years ago Diamond Aerosol stopped manufacturing laboratory chemicals and started to manufacture Fragrances and Cosmetics. Also included as part of the companies operations are packageing of products such as caulking compound, lens cleaner and tear gas (CS). The company usually operates on a daily basis as a two shift work schedule. The entire company sits on 43 acres although the operation area, wharehouse and general working area covers approximatly 2½ to 3 acres.

PROCESS

The fragrances and cosmetics are manufactured in batches as the specific ingredients are combined in mixing vats. Then the product is bottled, canned or tubed.

The waste generated from the manufacture of cosmetics and fragrances results in washing out the vats. The fragrance vats are washed out with ISOPROPANOL or ACETONE. The amount of wash solution used [redacted] is approximatly one gallon when a vat is cleaned. This wash solution is stored in Fifty Five gallon drums as a hazardous waste as Reported by Mr DIAMOND.

Summary of Findings Page 2

Facility Description and Operations PROCESS Continued

The cosmetic vats are washed out with water which generates approximatly one gallon of wash solution. This wash solution is put into the pipe system that leads to the companies leach field. This leach field is used for non contact cooling water for air compressors, cosmetic VATs with an outer cooling jacket and runoff from steam condensate as well as the above water wash solution. As Reported by Mr Diamond the company has obtained a NPDES for this discharge.

The packageing of products such as the caulking compound ⅓ lens cleaner generate no waste. The packageing of the tear Gas(CS) does generate some hazardous waste. The tear gas (CS) is recieved in a solid state in fifty five gallon containers. This solid tear gas (CS) is dissolved by miping it with acetone. The tear gas (CS) is then packaged in canisters with CO_2 used as a propellent. During the packageing procedures usually samples of the tear gas are kept and tester setains are kept along with any ½ full canisters that result. Since the canister contains 1% tear gas or orthochlorobenzalmalononitrile (CS) in a non toxic solvent system consisting of "F F" solvent and acetone, the company stores these small amounts and accumulates a load for disposal as a hanardous waste.

Summary of Findings Page 3

Facility Description and Operations

A tour of the plant was conducted by Mr Diamond Chairman of the Board for Diamond Aersol, Mr Venner and myself N.J.D.E.P. environmental specialists. We noted a very clean packageing area and a very clean fragrance and cosmetics manufacturing area as well. We also noted various warehouse areas for the storage of both product and raw materials. These storage areas were filled to almost capacity but were observed to be very clean. An area to the rear of the property is being reviewed by the twp. and its been graded for an additional warehouse to be built to alleviate the storage problem.

Mr Diamond then showed Mr Venner and I the empty drum storage area. We observed drums stored on their sides which were empty when visually checked. We also observed approximatly 58 drums standing upright on the same area. After a visual check was made we noted some of these drums were full or partially full. Mr Diamond said that he wasn't sure since the drums were not marked or labeled but he said these drums possibly can contain wash solution waste, old inventory purchased by Diamond Aersol

Summary, Conclusions and

which was never used, waste T F. solvent, waste acetone and also waste canisters of tear gas. Mr Diamond informed Mr Venner and I that since the empties are going to be taken off site by the NICK FOGLIA STEEL DRUM Co. in E. Hanover N.J., he will segregate those full and partially full drums for identification and proper use or disposal. Mr Diamond informed Mr Venner and I that since small quantities of waste are generated the drums of waste on site would be approximatly an 8 to 10 year accumulation.

Describe the activities that result in the generation of hazardous waste.

1) Wash solution waste is generated after a VAT is washed out. (usually this is a fragrance product & isopropanol or acetone)
2) Tear gas (CS) waste is generated after amounts of this product is packaged. The ½ canisters & sample retains accumulate that requires disposal.
3) unknown spill clean-up waste that occurs during normal working procedures.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

As noted on the companies Part A application three waste codes were designated. see below:

D001 - ignitables
F002 - halogenated solvents
U002 - acetone

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes:

☐ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☒ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

GENERATOR INSPECTION CHECKLIST

	YES	NO	N/A
40 CFR 262 Subpart A-General			
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?	X		
Is the waste hazardous?			
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?			
40 CFR 262 Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?		X	
If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?			
— the generators name, mailing address, telephone number and EPA I.D. Number?			
— the transporters name and EPA I.D. Number?			
— the name, address and EPA ID Number of the designated facility?			
— a description of the wastes (DOT)?			
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?			
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?			
(obtain a copy of the incomplete manifests)			
40 CFR 262 - Subpart D - Recordkeeping and Reporting			
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)			
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?			
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			

	YES	NO	N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) — — —

2) Label each package according to DOT (i.e., 49 CFR 172) — — —

3) Mark each package according to DOT (i.e., 49 CFR 172) — — —

4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) — — —

262.34 Accumulation Time

1) How is waste accumulated on-site?

☒ Containers

☐ Tanks

☐ Surface impoundments (complete HWMF checklist)

☐ Piles (complete HWMF checklist)

2) Is waste accumulated for more than 90 days? X — —

If yes, complete HWMF checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? — X —

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements? — X —

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

	YES	NO	N/A
40 CFR 265 - Subpart I Containers			
265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?	___	___	___
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	___	___	___
If not, please explain.			
265.173(a) - Are all containers closed except those in use?	___	___	___
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	___	___	___
265.174 - Is the storage area inspected at least weekly?	___	___	___
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	___	___	___
265.177 - Are incompatible wasts stored separate from each other?	___	___	___

	YES	NO	N/A
40 CFR 265 Subpart J - Tanks			
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	___	___	___
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	___	___	___
If no, please explain.			
2) Are there leaking tanks?	___	___	___
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	___	___	___
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	___	___	___
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	___	___	___
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	___	___	___
b) monitoring equipment	___	___	___
c) level of waste in tank	___	___	___
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	___	___	___
3) Are there underground tanks?	___	___	___
If yes, how many and can they be entered for inspection?	___	___	___
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	___	___	___
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	___	___	___

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	—	—	—
If yes, have facility personnel taken part in an annual review of training?	—	—	—
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	—	—	—
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	—	—	—
—actual training or experience received by personnel?	—	—	—
3) Are training records kept on all employees for at least 3 years?	—	—	—
40 CFR 265 - Subpart C - Preparedness and Prevention			
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	—	—	—
— a telephone or other device to summon emergency assistance from local authorities?	—	—	—
— portable fire equipment?	—	—	—
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	—	—	—
265.33 Is equipment tested and maintained?	—	—	—
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	—	—	—
265.35 Adequate aisle space?	—	—	—
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.	—	—	—
40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	—	—	—
1) Does the plan describe arrangements made with the local authorities?	—	—	—
2) Has the contingency plan been submitted to the local authorities?	—	—	—
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	—	—	—
4) Does the plan have a list of what emergency equipment is available?	—	—	—
5) Is there a provision for evacuating facility personnel?	—	—	—
6) Was there an emergency coordinator present or on call at the time of the inspection?	—	—	—

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	___	___	___
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long? _____10 days or less _____more than 10 days (complete TSD form)	___	___	___
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	___	___	___
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	___	___	___
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	___	___	___
o Transporter's name, EPA I.D. number, signature and date of signature	___	___	___
o TSDF's name, address and EPA I.D. Number	___	___	___
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	___	___	___
o Manifest Document number	___	___	___
o Proper DOT shipping description	___	___	___
o Quantity & type of containers	___	___	___
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	___	___	___
262.22 - Have records been kept since November 19, 1980?	___	___	___
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	___	___	___
If yes, was the incident report submitted to DOT? (obtain copy of the report)	___	___	___
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	___	___	___

General Comments:

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A
40 CFR Part 265 Subpart B General Facility Standards			
265.13-General Waste Analysis			
1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste)	X		
2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? You may check only one			
Waste characteristics vary _____			
All waste are basically the same _____			
Company treats all waste as hazardous ____			
3) Is there a written waste analysis plan at the facility?			
Does it contain the following:			
a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.			
b) Test methods used to test these parameters.			
c) Sampling methods to obtain a representative sample of the waste to be analyzed.			
d) Frequency of repeated analysis to ensure accurate and current information.			
4) Does hazardous waste come to this facility from an outside source? e.g. another generator.			
5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?			
265.14-Security			
1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of this facility?		X	
2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X		
If no, explain what measures are taken for security.			
265.15 - General Inspections Requirements			
1) Does the facility have a written inspection schedule?		X	
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?			
3) Does the owner/operator record inspections in a log?			
4) Is there evidence that problems reported in the inspection log have been remedied?			
If no, please explain.			

buildings are locked and owner lives on site.

265.16 - Personnel Training	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	—	X	—
If yes, have facility personnel taken part in an annual review of training?	—	—	—
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	—	—	—
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	—	—	—
—actual training or experience received by personnel?	—	—	—
3) Are training records kept on all employees for at least 3 years?	—	—	—

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes			
1) Are there ignitable, reactive or incompatible waste on site?	X	—	—
If yes, what are the approximate types and quantities and location of the waste.	solvent waste stored in drums. Approximate amount is 5 drums of ignitable waste on site.		
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	X	—	—
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?	X	—	—
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	X	—	—
— damage the structural integrity of the device or facility containing the waste?	X	—	—
— threaten human health or the environment?	X	—	—

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	X		
— a telephone or other device to summon emergency assistance from local authorities?	X		
— portable fire equipment?	X		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	X		
265.33 Is equipment tested and maintained?	X		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	X		
265.35 Adequate aisle space?	X		
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.			

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?		X	
1) Does the plan describe arrangements made with the local authorities?			
2) Has the contingency plan been submitted to the local authorities?			
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?			
4) Does the plan have a list of what emergency equipment is available?			
5) Is there a provision for evacuating facility personnel?			
6) Was there an emergency coordinator present or on call at the time of the inspection?			

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?		X	
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?			X
If not, please explain.			

	YES	NO	N/A
3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)			
4) Does each manifest have the following information? (circle missing information)			
— a manifest document number?	—	—	—
— the generators name, mailing address, telephone number and EPA I.D. #?	—	—	—
— the transporters name and EPA I.D. Number?	—	—	—
— the TSD name, address, telephone number & EPA I.D. Number?	—	—	—
— a description of the waste (DOT)?	—	—	—
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	—	—	—
— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	—	—	—
(Obtain a copy of the incomplete manifests)			

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?	—	—	—
Describe unreconciled descrepancies.			

265.73 - Operating Record

1) Does the facility keep an operating record?	—	X	—
2) Does the record contain the following information:			
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?	—	—	—
b) The location and quantity of each hazardous waste at each location?	—	—	—
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?	—	—	—
d) Summary reports and details of all incidents that require implementing the contingency plan.			
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?	—	—	—
f) Monitoring, testing or analytical data where required for:			
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?	—	—	—

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?	—	—	X
If yes, has the facility submitted an unmanifested waste report?	—	—	X

40 CFR 265 Subpart F - Groundwater Monitoring	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure			
265.111 Closure Performance Standard			
Have any portions of the facility been closed since November 19, 1980?		X	
If yes, please explain			
265.112 - Closure Plan			
Does the facility have a written closure plan? (Applies to all types of TSD facilities)		X	
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?			
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?			
3. A description of the steps necessary to decontaminate facility equipment during closure?			
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?			
5. Does the owner/operator have a written estimate of of the cost of closing the facility?			
If yes, what is it? ($)			
265.118 - Post Closure Plan			
Does the facility have a written post-closure plan? (Applies only to disposal facilities)			X
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($)			

Please circle all apppropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
Container - pg 6	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other_____
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

	YES	NO	N/A

40 CFR 265 - Subpart I - Containers

1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) — Fifty Five gallon drums of wash solution waste

2) - Is there a containment system for spills, leaks and precipitation? — X

If yes, describe.

265.171 - Do the containers appear to be in good condition, not in danger of leaking? — X

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

265.172 - Are hazardous waste stored in containers made of compatible materials? — X

If not, please explain.

265.173(a) - Are all containers closed except those in use? — X

265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? — X

265.174 - Is the storage area inspected at least weekly? — X

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line? — X

265.177 - Are incompatible wastes stored separate from each other? — X

If no, explain

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste?			
2) Identify the waste treated/stored in each tank.			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?			
If no, please explain.			
2) Are there leaking tanks?			
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?			
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?			
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank			
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment			
b) monitoring equipment			
c) level of waste in tank			
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?			
3) Are there underground tanks?			
If yes, how many and can they be entered for inspection?			
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?			
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?			

40 CFR 265 Subpart K - Surface Impoundments	YES	NO	N/A
Describe the design and operating features of the surface impoundment to prevent ground water contaimination (e.g., liner leachate collection system).			
265.220 - Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of wastes stored and treated.			
265.222 - Is there at least 2 feet of freeboard in the impoundment?	___	___	___
265.223 - Do all earthen dikes have a protective cover to preserve their structural integrity?	___	___	___
If yes, please specify the type of covering.			
265.226 - 1) Is the free board level inspected daily?	___	___	___
2) Are the dikes surrounding the surface impoundment inspected for leaks, deterioration or failures inspected weekly?	___	___	___
265.229 - 1) Are any ignitable or reactive wastes placed in the impoundment?	___	___	___
2) If yes, is the waste treated immediately after placement in the impoundment to render the waste non-active and/or non-ignitable?	___	___	___
3) If no, to (2) explain.			
265.230 - Are incompatible wastes placed in the impoundment?	___	___	___
If yes, explain.			

40 CFR 265 Subpart L - Waste Piles	YES	NO	N/A
265.250 - How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)			
265.251 - Is the waste pile protected from wind erosion?	—	—	—
a) Does it appear to need such protection?	—	—	—
b) Explain what type of protection does exist.			
265.253 Containment			
1) Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.	—	—	—
2) Is the pile placed on an impermeable base?	—	—	—
3) Is run-on diverted away from the pile?	—	—	—
4) Is the leachate and run-off collected and treated?	—	—	—
If no to any of the above questions above then:			
5) Is the pile protected from precipitation and run-on?	—	—	—
6) Are wastes containing free liquids placed in the pile?	—	—	—
265.256 - 1) Are ignitable or reactive wastes placed on the pile? If no, skip to §265.257	—	—	—
2) Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive? If no, explain.	—	—	—
3) Is the waste protected from any materials or condition that may cause it to ignite or react? If no, explain.	—	—	—
265.257 - Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other device? If no, explain.	—	—	—

40 CFR 265 Subpart M - Land Treatment

265.270 - Identify the types of waste and the size of the land treatment area?

	YES	NO	N/A
265.272 - General Operating Requirements			
1) Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?	—	—	—
Please explain how.			
2) Is run-on diverted from the active portions of the land treatment facility?	—	—	—
3) Is run-off from the active portions of the facility collected?	—	—	—
If yes, is the run-off a hazardous waste?	—	—	—
265.276 - Food Chain Crops			
1) Are food chain crops being grown on the facility property? If yes, can the facility operator document that arsenic lead and mercury:	—	—	—
- will not be transferred to the crop or ingested by food-chain animals or	—	—	—
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on the untreated soils.	—	—	—
2) Has notification of the growing of food chain crops been made to the Regional Administrator?	—	—	—
265.278 - Is there a written and implemented plan for unsaturated zone monitoring?	—	—	—
Make copy for office review.			
265.279 - Are there records of the application dates, application rates, quantities and location of each hazardous waste placed at the facility?	—	—	—
265.281 - Is ignitable or reactive waste immediately incorporated into the soil so that the resulting waste no longer meets that definition?	—	—	—
If not, please explain.			
265.282 - Are incompatible waste placed in separate land treatment areas?	—	—	—
If no, please explain.			

40 CFR 265 Subpart N - Landfills

	YES	NO	N/A
265.300 - Identify the types of waste and size of the landfill.			
265.302 - General Operating Requirements			
1) Is run-on diverted away from the active portions of the landfill?	___	___	___
2) Is run-off from active portions of the landfill collected?	___	___	___
3) Is waste which is subject to wind dispersal controlled?	___	___	___
Please explain how.			
265.309 - Does the owner/operator maintain a map with:			
1) The exact location and dimensions of each cell?	___	___	___
2) The contents of each cell and approximate location of each hazardous waste type?	___	___	___
265.312 - Is ignitable or reactive waste treated so that it is not ignitable or reactive before being place in the landfill?	___	___	___
Explain how you know.			
265.313 - Are precautions taken to ensure that incompatible waste are not placed in the same landfill cell?	___	___	___
If no, please explain.			
265.314 Special Requirements for Liquid Waste			
1) Are bulk or non-containerized wastes containing free liquids placed in the landfill?	___	___	___
If yes,			
a) Does the landfill have a liner which is chemically and physically resistant to the added liquid? or	___	___	___
b) Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
2) Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
Please describe the types and contents of such containers placed in the landfill.			
265.315 - Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried ?	___	___	___
265.316 - Are small containers of hazardous waste in overpacked drums placed in the landfill?	___	___	___
If yes, please describe precautions taken to prevent the release of the waste.			

40 CFR 265 Subpart O & P - Incinerator and Thermal Treatment	YES	NO	N/A
1) What type of incinerator or thermal treatment is at the site (e.g waterwall incinerator, boiler, fluidized bed, etc.)			
2) List the types and quantities of HW incinerated or thermally treated.			
3) Is the residue from the incinerator thermal treatment unit a hazardous waste?	—	—	—
4) What types of air pollution control devices (if any) are installed in the incinerator/or thermal treatment unit?			
5) Is energy recovered from the process? If yes, describe.	—	—	—
6) What is the destruction and removal efficiency for the organic hazardous waste constituents?			
265.341 and 265.375 - Does the operating record include additional analysis to determine types of pollutants which might be emitted including:			
- heating value of the waste?	—	—	—
- halogen and sulfur content?	—	—	—
- concentrations of lead and mercury?	—	—	—
If no to any of the above questions is there justification and documentation?	—	—	—
265.345 and 265.373 If operating, does it appear the incinerator/or thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	—	—	—
265.347 and 265.377 - Monitoring and Inspection			
1) Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	—	—	—
If no, explain			
2) Does the incinerator/thermal treatment have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments)	—	—	—
If no, explain.			
3) Is the stack plume observed visually at least hourly for opacity and color?	—	—	—
4) Are there any signs of leaks, spill and fugitive emissions associated with the pumps, valves, conveyors, pipes etc? If yes, describe.	—	—	—
5) Are all emergency shutdown controls and system alarms checked to assure proper operation?	—	—	—
6) Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained. If yes, explain.	—	—	—
7) Is the incinerator/thermal treatment inspected daily?	—	—	—

	YES	NO	N/A
265.382 Is there open burning of hazardous waste?	___	___	___
a) If yes, what is being burned? (Only burning or detonation of explosives is permitted)			
b) If open burning or detonation of explosives is taking place approximately what is the distance from the open burning or detonation to the property of others?			

40 CFR 265 Subpart Q - Chemical, Physical and Biological Treatment (other than in tanks, surface impoundments or lant treatment facilities)

1) Describe the treatment system at this facility and the the types of wastes treated.

265.401 - Does the treatment process system show any signs of ruptures, leaks or corrosion?	___	___	___
If yes, describe.			
265.401 - Is there a means to stop the inflow of continuously-fed hazardous wastes?	___	___	___
265.403 - Inspections			
1) Is the discharge control safety equipment (e.g. waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order?	___	___	___
Are they inspected at least once each operation day?	___	___	___
2) Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?	___	___	___
Is data gathered at least once each operating day?	___	___	___
3) Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	___	___	___
4) Are the discharge confinement structures, (e.g. dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g. wet spots or dead vegatation?	___	___	___
265.405 - Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or or conditions which may cause it to ignite or react?	___	___	___
If yes, explain how.			
265.406 - Are the incompatible wastes placed in the same treatment process?	___	___	___
If yes, please explain.			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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RCRA GENERATOR INSPECTION CHECKLIST

Generator's Name: DIAMOND AEROSOL

EPA I.D. #: NJD049644438

Generator's Address: ANTHONY & WOOD GLEN RDS. GLEN GARDNER

Contact: RALPH HELMRICH

	YES	NO
1. Does generator have an EPA I.D. number?	(✓)	( )
2. Does generator store material on-site?	(✓)	( )
3. Is waste accumulated for more than 90 days?	(✓)	( )
4. Does generator manifest waste?	( )	(✓)
5. Does manifest show following information:		
a. Name, address, I.D. of generator	( )	(✓)
b. Name, address, I.D. of transporter	( )	(✓)
c. Name, address, I.D. of designated facility	( )	(✓)
d. Name, of alternative facility	( )	(✓)
e. DOT waste description	( )	(✓)
f. Quantity of waste-volume, weight, number of containers	( )	(✓)
g. Signed certification statement	( )	(✓)
6. Does generator maintain manifest records?	( )	(✓)

7. General Comments:

DIAMOND AEROSOL MANUFACTURES MASE (CS + CN) AND ALSO BLENDS CHEMICALS FOR THE COSMETIC INDUSTRY. DIAMOND AEROSOL IS A SMALL GENERATOR (LESS THAN 1000 KG/MONTH) OF HAZARDOUS WASTE.

WAYNE HOWITZ

Inspected By: Chuck Elcandor77.

Date: 02-27-81

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TSD FACILITY INSPECTION CHECKLIST

Company's Name: DIAMOND AEROSOL EPA I.D. #: NJD049644438

Company's Address: ANTHONY & WOODGLEN RDS. GLEN GARDNER Contact: RALPH HELMRICH

	YES	NO
1. Does the facility have an EPA I.D. number?	(✓)	( )
2. In what capacity does the facility handle hazardous waste? Circle all appropriate	( )	( )

Storer	Treater	Disposer
Pile	Filtration	Landfill
(Drums)	Incineration	Land Treatment
Surface Tanks	Thermal	Incineration
Subsurface Tanks	Chemical	Surface Impoundment
Surface Impoundments	Biological	Other _____
Other _____	Other _____	

3. Does the facility generate hazardous waste?	( )	( )
4. Does the facility transport hazardous waste?	( )	(✓)
5. Does the facility comply with the following	( )	( )
a. Adequate Security	( )	( )

Comments: SITE IS PATROLLED BY THE LOCAL POLICE NO PHYSICAL BARRIERS EXIST AROUND THIS SITE.

b. Contingency Plan and Emergency Procedures	( )	(✓)

Comments: NO FORMAL PLAN.

c. Inspection Plan	( )	( )

Comments: NO WRITTEN / A FORMAL INSPECTION PLAN.

d. Personnel Training	( )	( )

Comments: PERSONNEL ARE TRAINED ON THE JOB

e. Waste Analysis Plan ( ) (✓)
Comments: NO WRITTEN WASTE ANALYSIS.
MR. HELMRICH CLAIMS THE ONLY WASTE GENERATED WOULD BE FROM THE MANUFACTURE OF MASE.

f. Preparedness and Prevention Plans ( ) (✓)
Comments: NO FORMAL PLAN.

6. Has the facility filed a part A permit application? (✓) ( )

7. Does the facility maintain manifest records? ( ) ( )

8. Does the facility have other environmental permits? ( ) ( )

a. NPDES PERMIT # NJ0034894 (✓) ( )

b. Air (✓) ( )

c. State (✓) ( )
--identify

d. Other ( ) ( )
--identify

9. Identify hazardous wastes handled and method for handling
SMALL GENERATOR (LESS THAN 1000 KG/MONTH).

10. General Comments
THIS FACILITY GENERATES LESS THAN 1000 KG/MONTH. DIAMOND AEROSOL, FORMERLY DISCHARGED WASTES INTO A LEACH FIELD. HOWEVER, THE N.J. DEP. OF WATER RESOURCES (CONTINUED

Inspected by: WAYNE HOWITZ & CHUCK ELOMDORF

Date: 02-27-81